

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

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| IN RE: GENERIC PHARMACEUTICALS PRICING ANTITRUST LITIGATION | MDL 2724 16-MD-2724 |
| IN RE: DOXYCYCLINE CASES THIS DOCUMENT RELATE TO: <i>ALL DOXYCYCLINE DIRECT PURCHASER ACTIONS</i> | HON. CYNTHIA M. RUFÉ LEAD CASE: 16-DX-27240 DIRECT CASE: 16-DX-27241 JURY TRIAL DEMANDED |
| AHOLD USA, INC.; CÉSAR CASTILLO, INC. FWK HOLDINGS, L.L.C.; KPH HEALTHCARE SERVICES, INC., a/k/a KINNEY DRUGS, INC.; and ROCHESTER DRUG CO-OPERATIVE, INC.; on behalf of themselves and all other similarly situated, Plaintiffs, v. ACTAVIS HOLDCO U.S., INC.; HERITAGE PHARMACEUTICALS, INC.; MAYNE PHARMA USA, INC.; MYLAN INC.; MYLAN PHARMACEUTICALS INC.; PAR PHARMACEUTICAL, INC.; SUN PHARMACEUTICAL INDUSTRIES, INC.; and WEST-WARD PHARMACEUTICALS CORP., Defendants. | |

**DEFENDANT SUN PHARMACEUTICAL INDUSTRIES, INC.'S ANSWER TO THE
DOXYCYCLINE CONSOLIDATED DIRECT PURCHASER
CLASS ACTION COMPLAINT**

Defendant Sun Pharmaceutical Industries, Inc. (“Sun”) hereby responds to the allegations in Ahold USA, Inc., Cesar Castillo, Inc., FWK Holdings, LLC, KPH Healthcare Services, Inc., a/k/a Kinney Drugs, Inc., and Rochester Drug Co-Operative, Inc.’s (“Plaintiffs”) Direct Purchaser Class Action Complaint and Demand for Jury Trial (the “Complaint”). The headings and sub-headings in Plaintiffs’ Complaint require no response. However, to the extent a response is required, Sun denies all allegations in the headings and sub-headings in Plaintiffs’ Complaint.

I. INTRODUCTION

1. Sun admits that the Plaintiffs purport to bring this action as a class action but denies that there is any basis to do so. Sun denies that it has engaged in any wrongdoing alleged in the Complaint and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the remaining allegations in Paragraph 1 and footnote 1, and, on that basis, denies those allegations.

2. The allegations in Paragraph 2 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations in Paragraph 2 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that pricing for generic drugs must be considered on a case-by-case basis. On that basis, Sun lacks knowledge or information to admit or deny the allegations in the first sentence of Paragraph 2, and denies those allegations. Sun further denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun is without sufficient knowledge or information to admit or deny the allegations that relate to any entities other than Sun, and, on that basis, denies those allegations.

3. The allegations in Paragraph 3 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 3 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun is without sufficient knowledge or information to admit or deny the allegations that relate to any entities other than Sun, and, on that basis, denies those allegations.

4. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the remaining allegations in Paragraph 4, and, on that basis, denies those allegations.

5. Sun admits that Doxycycline is a tetracycline antibiotic prescribed to patients for the treatment of a variety of bacterial infections, including acne, urinary tract infections, eye infections, Lyme disease, intestinal infections, sexually-transmitted diseases, and gum disease, among others. Sun states that the referenced sources speak for themselves. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

6. Sun admits that it distributes Doxycycline Hyclate Regular Release. Sun states that the referenced sources speak for themselves. The remaining allegations in Paragraph 6 and footnote 3 state a legal conclusion to which no response is required. To the extent a response is required, Sun denies the remaining allegations that relate to Sun and denies that Sun engaged in any wrongful conduct. Sun is without sufficient knowledge or information to admit or deny the allegations that relate to any entities other than Sun, and, on that basis, denies those allegations. Sun further denies the remaining allegations in Paragraph 6 and footnote 3.

7. Sun states that the referenced sources speak for themselves. The remaining allegations in Paragraph 7 state a legal conclusion to which no response is required. To the extent

a response is required, Sun denies the allegations in Paragraph 7 that relate to Sun and denies that Sun engaged in any wrongful conduct. Sun is without sufficient knowledge or information to admit or deny the allegations that relate to any entities other than Sun, and, on that basis, denies those allegations. Sun further denies the remaining allegations in Paragraph 7 and footnote 4.

8. Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 8 and, on that basis, denies those allegations. Sun further denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun.

9. Sun states that the referenced sources speak for themselves. The allegations in Paragraph 9 and footnote 5 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 9 and footnote 5 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

10. Sun states that the referenced sources speak for themselves. Sun admits that in May 2016, Sun received a grand jury subpoena from the DOJ Antitrust Division. The remaining allegations in Paragraph 10 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the remaining allegations in Paragraph 10 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

11. Sun states that the referenced sources speak for themselves. The allegations in Paragraph 11 and footnote 6 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 11 and footnote 6 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

12. Sun admits that the Department of Justice filed Complaints in the U.S. District Court for the Eastern District of Pennsylvania and states that those Complaints speak for themselves. Sun further states that it is without sufficient information to form a belief about the truth of the remaining allegations in Paragraph 12 and, on that basis, denies those allegations.

13. Sun admits that on January 9, 2017, a plea hearing was held in a case captioned *United States v. Glazer*, No. 2:16-cr-00506, and states that the transcript of that hearing speaks for itself. Sun states that the referenced sources speak for themselves. Sun further states that it is without sufficient information to form a belief about the truth of the allegations in Paragraph 13 and footnote 7 and, on that basis, denies those allegations.

14. Sun admits that on January 9, 2017, a plea hearing was held in a case captioned *United States v. Malek*, No. 2:16-cr-00508, and states that the transcript of that hearing speaks for itself. Sun states that the referenced sources speak for themselves. Sun further states that it is without sufficient information to form a belief about the truth of the allegations in Paragraph 14 and footnote 8 and, on that basis, denies those allegations.

15. Sun admits that the Department of Justice filed a motion in the U.S. District Court for the Eastern District of Pennsylvania, and states that the motion speaks for itself. Sun further

states that the allegations contained in Paragraph 15 and footnote 9 relate to issues that have been raised, but not proven, in the cited litigation, and, on that basis, denies those allegations. Sun further states that it lacks knowledge or information sufficient to admit or deny the allegations as to any other entity, such as other entities named in the cited Complaint. Sun further states that it is without sufficient information to form a belief about the truth of the remaining allegations in Paragraph 15 and footnote 9, and, on that basis, denies those allegations.

16. Sun admits that the attorneys general of certain states filed a Complaint in the U.S. District Court for the District of Connecticut against certain generic pharmaceutical drug manufacturers, and states that the Complaint speaks for itself. Sun states that the referenced sources speak for themselves. Sun further states that the allegations in Paragraph 16 and footnotes 10, 11, and 12 relate to issues that have been raised, but not proven, in the cited litigation, and, on that basis, denies those allegations. The remaining allegations in Paragraph 16 and footnotes 10, 11, and 12 state a legal conclusion to which no response is required. To the extent a response is required, Sun denies the remaining allegations in Paragraph 16 and footnotes 10, 11, and 12. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

17. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to admit or deny the allegations in Paragraph 17.

18. The allegations in Paragraph 18 state a legal conclusion to which no response is required. To the extent a response is required, Sun denies the remaining allegations in Paragraph 18 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that

it is without sufficient knowledge or information to admit or deny the allegations that relate to any entities other than Sun, and, on that basis, denies those allegations.

19. Sun admits that Plaintiffs purport to be direct purchasers and purport to bring claims under Section 1 of the Sherman Act. The remaining allegations in Paragraph 19 state a legal conclusions to which no response is required. To the extent a response is required, Sun denies the remaining allegations in Paragraph 19, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun.

II. JURISDICTION AND VENUE

20. Sun admits that Plaintiffs purport to bring this action under Section 4 of the Clayton Act and for violations of Section 1 of the Sherman Antitrust Act, and that this Court has jurisdiction over this action. The remaining allegations in Paragraph 20 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the remaining allegations in Paragraph 20, denies that it has engaged in any wrongdoing alleged in the Complaint and denies that Plaintiffs have been injured as a result of any conduct by Sun.

21. Sun admits that venue is proper in this district for this action only. The remaining allegations in Paragraph 21 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the remaining allegations.

22. Sun admits that it distributed Doxycycline Hyclate Regular Release. The remaining allegations in Paragraph 22 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the remaining allegations in Paragraph 22 that relate to Sun. Sun further states that it is without sufficient knowledge or information to admit or deny the allegations that relate to any entities other than Sun, and, on that basis, denies those allegations.

23. Sun admits that this Court has jurisdiction over this action. The remaining allegations in Paragraph 23 state legal conclusions to which no response is required. To the extent

a response is required, Sun denies the remaining allegations in Paragraph 23, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to admit or deny the allegations that relate to any entities other than Sun, and, on that basis, denies those allegations.

III. PARTIES

24. Sun denies that it has engaged in any wrongdoing alleged in the Complaint and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun states that it is without sufficient knowledge or information to form a belief about the truth of the remaining allegations in Paragraph 24 and, on that basis, denies those allegations.

25. Sun denies that it has engaged in any wrongdoing alleged in the Complaint and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun states that it is without sufficient knowledge or information to form a belief about the truth of the remaining allegations in Paragraph 25 and, on that basis, denies those allegations.

26. Sun denies that it has engaged in any wrongdoing alleged in the Complaint and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun states that it is without sufficient knowledge or information to form a belief about the truth of the remaining allegations in Paragraph 26 and, on that basis, denies those allegations.

27. Sun denies that it has engaged in any wrongdoing alleged in the Complaint and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun states that it is without sufficient knowledge or information to form a belief about the truth of the remaining allegations in Paragraph 27 and, on that basis, denies those allegations.

28. Sun denies that it has engaged in any wrongdoing alleged in the Complaint and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun states that it is

without sufficient knowledge or information to form a belief about the truth of the remaining allegations in Paragraph 28 and, on that basis, denies those allegations.

29. Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 29 and, on that basis, denies those allegations.

30. Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 30 and, on that basis, denies those allegations.

31. Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 31 and, on that basis, denies those allegations.

32. Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 32 and, on that basis, denies those allegations.

33. Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 33 and, on that basis, denies those allegations.

34. Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 34 and, on that basis, denies those allegations.

35. Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 35 and, on that basis, denies those allegations.

36. Sun admits that it is a distributor of Doxycycline Hyclate Regular Release, that Sun is a Michigan corporation, Sun's principal place of business is in Princeton, New Jersey, and that Sun's parent company, Sun Pharmaceutical Industries Ltd., a pharmaceutical company incorporated in India, acquired URL Pharma, Inc. ("URL"), including Mutual Pharmaceutical Company, Inc., in 2012. Sun denies the remaining allegations in Paragraph 36.

37. Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 37 and, on that basis, denies those allegations.

38. The allegations in Paragraph 38 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 38 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

39. The allegations in Paragraph 39 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 39 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

40. The allegations in Paragraph 40 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 40 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

41. The allegations in Paragraph 41 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 41 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is

without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

42. The allegations in Paragraph 42 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 42 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

43. The allegations in Paragraph 43 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 43 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

IV. INTERSTATE TRADE AND COMMERCE

44. Sun admits that it distributes Doxycycline Hyclate Regular Release. Sun is without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 44 and, on that basis, denies those allegations.

45. Sun admits that it distributes Doxycycline Hyclate Regular Release. Sun is without sufficient knowledge or information to admit or deny the remaining allegations in Paragraph 45 and, on that basis, denies those allegations.

46. Sun admits that it distributes Doxycycline Hyclate Regular Release. The remaining allegations in Paragraph 46 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the remaining allegations in Paragraph 46 that relate to Sun,

denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

47. The allegations in Paragraph 47 state a legal conclusion to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 47 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to admit or deny the allegations that relate to any entities other than Sun, and, on that basis, denies those allegations.

48. The allegations in Paragraph 48 state a legal conclusion to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 48 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to admit or deny the allegations that relate to any entities other than Sun, and, on that basis, denies those allegations.

49. The allegations in Paragraph 49 state a legal conclusion to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 49 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to admit or deny the allegations that relate to any entities other than Sun, and, on that basis, denies those allegations.

50. The allegations in Paragraph 50 state a legal conclusion to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 50 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to admit or deny the allegations that relate to any entities other than Sun, and, on that basis, denies those allegations.

V. FACTUAL ALLEGATIONS

51. Sun states that the referenced source speaks for itself. Sun denies that Paragraph 51 and footnote 13 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 51 and footnote 13, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

52. Sun states that the pertinent statutes and regulations speak for themselves. Sun denies the characterization of these statutes and regulations. The remaining allegations in Paragraph 52 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations.

53. Sun states that the pertinent statutes and regulations speak for themselves. Sun denies the characterization of these statutes and regulations. The remaining allegations in Paragraph 53 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations.

54. Sun states that the pertinent statutes and regulations speak for themselves. Sun denies the characterization of these statutes and regulations. The remaining allegations in Paragraph 54 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that Paragraph 54 provides a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 54, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

55. Sun states that the laws, regulations, legislative history, and “economic literature” described in Paragraph 55 speak for themselves. The remaining allegations in Paragraph 55 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that Paragraph 55 provides a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 55, and denies those allegations.

56. The allegations in Paragraph 56 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that Paragraph 56 provides a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge

or information to form a belief about the truth of the allegations in Paragraph 56, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

57. Sun states that the referenced sources speak for themselves. The allegations in Paragraph 57 and footnotes 14 and 15 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that Paragraph 57 and footnotes 14 and 15 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 57 and footnotes 14 and 15, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

58. Sun states that the referenced source speaks for itself. The allegations in Paragraph 58 and footnote 16 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that Paragraph 58 and footnote 16 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 58 and footnote 16, and denies those allegations. Sun further states that it is without sufficient knowledge or

information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

59. The allegations in Paragraph 59 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that Paragraph 59 provides a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 59, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

60. The allegations in Paragraph 60 and footnote 17 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that Paragraph 60 and footnote 17 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 60 and footnote 17, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

61. Sun states that the referenced sources speak for themselves. The allegations in Paragraph 61 and footnotes 18 and 19 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that Paragraph 61 and footnotes 18 and 19 provide a

complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 61 and footnotes 18 and 19, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

62. Sun states that the referenced sources speak for themselves. The allegations in Paragraph 62 and footnotes 20, 21, and 22 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations in Paragraph 62 and footnotes 20, 21, and 22 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 62 and footnotes 20, 21, and 22, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

63. Sun states that the referenced sources speak for themselves. The allegations in Paragraph 63 and footnotes 23 and 24 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that Paragraph 63 and footnotes 23 and 24 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without

sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 63 and footnotes 23 and 24, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

64. The allegations in Paragraph 64 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that Paragraph 64 provides a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 64, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

65. Sun states that the referenced sources speak for themselves. The allegations in Paragraph 65 and footnotes 25, 26, and 27 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that Paragraph 65 and footnotes 25, 26, and 27 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 65 and footnotes 25, 26, and 27, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

66. The allegations in Paragraph 66 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that Paragraph 66 provides a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 66, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

67. Sun admits that on January 9, 2017, a plea hearing was held in a case captioned *United States v. Glazer*, No. 2:16-cr-00506, and states that the transcript of that hearing speaks for itself. Sun further admits that on January 9, 2017, a plea hearing was held in a case captioned *United States v. Malek*, No. 2:16-cr-00508, and states that the transcript of that hearing speaks for itself. The allegations in Paragraph 67 state legal conclusions to which no response is required. To the extent a response is required, Sun states that it is without sufficient information to form a belief about the truth of the remaining allegations in Paragraph 67 and, on that basis, denies those allegations.

68. Sun admits that in May 2016, it received a grand jury subpoena from the Antitrust Division of the DOJ. The allegations in Paragraph 68 state legal conclusions to which no response is required. To the extent a response is required, Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the remaining allegations in Paragraph 68 that relate to Sun and, on that basis, denies those allegations. Sun further states that it is without

sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

69. Sun admits that the attorneys general of certain states filed a Complaint in the U.S. District Court for the District of Connecticut against certain generic pharmaceutical drug manufacturers, and states that the Complaint speaks for itself. Sun further states that the allegations in Paragraph 69 and footnote 28 relate to issues that have been raised, but not proven, in the cited litigation, and, on that basis, denies those allegations. The remaining allegations in Paragraph 69 and footnote 28, state a legal conclusion to which no response is required. To the extent a response is required, Sun denies the remaining allegations in Paragraph 69 and footnote 28. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

70. The allegations in Paragraph 70 state legal conclusions to which no response is required. To the extent a response is required, Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 70 and, on that basis, denies those allegations.

71. The allegations in Paragraph 71 and footnote 29 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations in Paragraph 71 and footnote 29 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 71 and footnote 29, and denies those allegations. Sun further states

that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

72. The allegations in Paragraph 72 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations in Paragraph 72 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 72, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

73. The allegations in Paragraph 73 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations in Paragraph 73 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 73, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

74. The allegations in Paragraph 74 footnote 30 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations in Paragraph 74 and footnote 30 provide a complete and/or accurate description of the aspects of the

generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 74 and footnote 30, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

75. Sun denies the allegations in Paragraph 75 that relate to Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

76. The allegations in Paragraph 76 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations in Paragraph 76 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 76, and denies those allegations. Sun further denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

77. The allegations in Paragraph 77 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations in Paragraph 77 provide a complete and/or accurate description of the aspects of the generic drug industry

purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 77, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

78. The allegations in Paragraph 78 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations in Paragraph 78 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 78, and denies those allegations.

79. The allegations in Paragraph 79 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations in Paragraph 79 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 79, and denies those allegations.

80. The allegations in Paragraph 80 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations in Paragraph 80 provide a complete and/or accurate description of the aspects of the generic drug industry

purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 80, and denies those allegations. Sun further denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun.

81. The allegations in Paragraph 81 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations in Paragraph 81 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 81, and denies those allegations. Sun further denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun.

82. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 82 and, on that basis, Sun denies those allegations.

83. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 83 and, on that basis, Sun denies those allegations.

84. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 84 and, on that basis, Sun denies those allegations.

85. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 85 and, on that basis, Sun denies those allegations.

86. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 86 and, on that basis, Sun denies those allegations.

87. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 87 and, on that basis, Sun denies those allegations.

88. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 88 and, on that basis, Sun denies those allegations.

89. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 89 and, on that basis, Sun denies those allegations.

90. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 90 and, on that basis, Sun denies those allegations.

91. The allegations in Paragraph 91 and footnote 31 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations in Paragraph 91 and footnote 31 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 91 and footnote 31, and denies those allegations. Sun further denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

92. The allegations in Paragraph 92 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations in Paragraph 92

provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 92, and denies those allegations. Sun further denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

93. Sun states that the referenced laws and sources speak for themselves. The allegations in Paragraph 93 and footnote 33 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations in Paragraph 93 and footnote 33 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 93 and footnote 33, and denies those allegations. Sun further denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

94. Sun states that the referenced sources speak for themselves. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 94 and footnotes 34, 35, 36, and 37, and, on that basis, Sun denies those allegations.

95. Sun states that the referenced sources speak for themselves. The allegations in Paragraph 95 and footnotes 38, 39, and 40 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations in Paragraph 95 and footnotes 38, 39, and 40 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 95 and footnotes 38, 39, and 40, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

96. Sun states that the referenced sources speak for themselves. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 96 and footnotes 41, 42, and 43 and, on that basis, Sun denies those allegations.

97. The allegations in Paragraph 97 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations in Paragraph 97 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 97, and denies those allegations. Sun further denies that it has engaged in any

wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

98. The allegations in Paragraph 98 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations in Paragraph 98 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 98, and denies those allegations. Sun further denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

99. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 99 and, on that basis, Sun denies those allegations.

100. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 100 and footnote 44 and, on that basis, Sun denies those allegations.

101. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 101 and, on that basis, Sun denies those allegations.

102. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 102 and, on that basis, Sun denies those allegations.

103. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 103 and, on that basis, Sun denies those allegations.

104. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 104 and, on that basis, Sun denies those allegations.

105. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 105 and, on that basis, Sun denies those allegations.

106. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 106 and, on that basis, Sun denies those allegations.

107. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 107 and, on that basis, Sun denies those allegations.

108. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 108 and, on that basis, Sun denies those allegations.

109. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 109 and, on that basis, Sun denies those allegations.

110. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 110 and, on that basis, Sun denies those allegations.

111. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 111 and, on that basis, Sun denies those allegations.

112. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 112 and, on that basis, Sun denies those allegations.

113. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 113 and, on that basis, Sun denies those allegations.

114. The allegations in Paragraph 114 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations in Paragraph 114 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 114, and denies those allegations. Sun further denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

115. The allegations in Paragraph 115 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations in Paragraph 115 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 115, and denies those allegations. Sun further denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to

form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

116. The allegations in Paragraph 116 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations in Paragraph 116 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 116, and denies those allegations. Sun further denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

117. The allegations in Paragraph 117 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 117 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

118. The allegations in Paragraph 118 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 118 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is

without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

119. Sun states that the referenced sources in Paragraph 119 and footnotes 46 and 47 speak for themselves. The allegations in Paragraph 119 and footnotes 46 and 47 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 119 and footnotes 46 and 47 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

120. Sun admits that certain Sun employees sometimes attended trade association meetings and industry events, but Sun lacks the knowledge or information sufficient to form a belief as to who attended any particular meeting or event. The remaining allegations in Paragraph 120 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 120 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

121. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 121 and footnote 48 and, on that basis, denies those allegations.

122. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 122 and footnote 49 and, on that basis, denies those allegations.

123. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 123 and, on that basis, denies those allegations.

124. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 124 and, on that basis, denies those allegations.

125. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 125 and, on that basis, denies those allegations.

126. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 126 and, on that basis, denies those allegations.

127. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 127 and, on that basis, denies those allegations.

128. Sun admits that Jim Kedrowski served on the board of GPhA in 2016. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the remaining allegations in Paragraph 128 and, on that basis, denies those allegations.

129. Sun admits that it has been a member of GPhA. Sun states that the referenced source speaks for itself. The allegations in Paragraph 129 and footnote 50 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 129 and footnote 50 that relate to Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

130. Sun admits that certain Sun employees sometimes attended trade association meetings and industry events, but Sun lacks the knowledge or information sufficient to form a belief as to who attended any particular meeting or event. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 130 and, on that basis, denies those allegations.

131. Sun states that the referenced source speaks for itself. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 131 and footnote 51 and, on that basis, denies those allegations.

132. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 132 and, on that basis, denies those allegations.

133. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 133 and, on that basis, denies those allegations.

134. Sun states that referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 134 and, on that basis, denies those allegations.

135. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 135 and, on that basis, denies those allegations.

136. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 136 and, on that basis, denies those allegations.

137. Sun admits that certain Sun employees sometimes attended trade association meetings and industry events, but Sun lacks the knowledge or information sufficient to form a

belief as to who attended any particular meeting or event. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

138. Sun admits that certain Sun employees sometimes attended trade association meetings and industry events, but Sun lacks the knowledge or information sufficient to form a belief as to who attended any particular meeting or event. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

139. Sun admits that certain Sun employees sometimes attended trade association meetings and industry events, but Sun lacks the knowledge or information sufficient to form a belief as to who attended any particular meeting or event. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

140. Sun admits that certain Sun employees sometimes attended trade association meetings and industry events, but Sun lacks the knowledge or information sufficient to form a belief as to who attended any particular meeting or event. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

141. Sun admits that certain Sun employees sometimes attended trade association meetings and industry events, but Sun lacks the knowledge or information sufficient to form a belief as to who attended any particular meeting or event. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

142. Sun admits that certain Sun employees sometimes attended trade association meetings and industry events, but Sun lacks the knowledge or information sufficient to form a belief as to who attended any particular meeting or event. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

143. Sun admits that certain Sun employees sometimes attended trade association meetings and industry events, but Sun lacks the knowledge or information sufficient to form a belief as to who attended any particular meeting or event. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

144. Sun admits that certain Sun employees sometimes attended trade association meetings and industry events, but Sun lacks the knowledge or information sufficient to form a belief as to who attended any particular meeting or event. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

145. Sun admits that certain Sun employees sometimes attended trade association meetings and industry events, but Sun lacks the knowledge or information sufficient to form a belief as to who attended any particular meeting or event. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

146. Sun admits that certain Sun employees sometimes attended trade association meetings and industry events, but Sun lacks the knowledge or information sufficient to form a belief as to who attended any particular meeting or event. Sun further states that it is without

sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

147. Sun admits that certain Sun employees sometimes attended trade association meetings and industry events, but Sun lacks the knowledge or information sufficient to form a belief as to who attended any particular meeting or event. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

148. Sun admits that certain Sun employees sometimes attended trade association meetings and industry events, but Sun lacks the knowledge or information sufficient to form a belief as to who attended any particular meeting or event. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

149. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 149 and, on that basis, Sun denies those allegations.

150. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 150 and, on that basis, Sun denies those allegations.

151. Sun admits that certain Sun employees sometimes attended trade association meetings and industry events, but Sun lacks the knowledge or information sufficient to form a belief as to who attended any particular meeting or event. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

152. Sun admits that certain Sun employees sometimes attended trade association meetings and industry events, but Sun lacks the knowledge or information sufficient to form a

belief as to who attended any particular meeting or event. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

153. Sun admits that certain Sun employees sometimes attended trade association meetings and industry events, but Sun lacks the knowledge or information sufficient to form a belief as to who attended any particular meeting or event. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

154. Sun admits that certain Sun employees sometimes attended trade association meetings and industry events, but Sun lacks the knowledge or information sufficient to form a belief as to who attended any particular meeting or event. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

155. Sun admits that certain Sun employees sometimes attended trade association meetings and industry events, but Sun lacks the knowledge or information sufficient to form a belief as to who attended any particular meeting or event. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

156. Sun admits that the attorneys general of certain states filed a Complaint in the U.S. District Court for the District of Connecticut against certain generic pharmaceutical drug manufacturers, and states that the Complaint referenced in Paragraph 156 and footnote 55 speaks for itself. Sun states that the allegations contained in Paragraph 156 and footnote 55 relate to issues that have been raised, but not proven, in the cited litigation, and, on that basis, denies those

allegations. The remaining allegations in Paragraph 156 and footnote 55 state a legal conclusion to which no response is required. Sun denies the allegations in Paragraph 156 and footnote 55 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

157. Sun admits that the attorneys general of certain states filed a Complaint in the U.S. District Court for the District of Connecticut against certain generic pharmaceutical drug manufacturers, and states that the Complaint referenced in Paragraph 157 and footnote 56 speaks for itself. Sun states that the allegations contained in Paragraph 157 and footnote 56 relate to issues that have been raised, but not proven, in the cited litigation, and, on that basis, denies those allegations. The remaining allegations in Paragraph 157 and footnote 56 state a legal conclusion to which no response is required. Sun denies the allegations in Paragraph 157 and footnote 56 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

158. Sun admits that it has offices in New Jersey. The remaining allegations in Paragraph 158 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 158 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or

information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

159. The allegations in Paragraph 159 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 159 that relate to Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

160. The allegations in Paragraph 160 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 160 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

161. The allegations in Paragraph 161 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 161 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

162. The allegations in Paragraph 162 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations of Paragraph 162 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for

pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 162, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

163. The allegations in Paragraph 163 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations of Paragraph 163 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 163, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

164. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 164 and, on that basis, denies those allegations.

165. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 165 and, on that basis, denies those allegations.

166. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 166 and, on that basis, denies those allegations.

167. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 167 and, on that basis, denies those allegations.

168. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 168 and, on that basis, denies those allegations.

169. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 169 and, on that basis, denies those allegations.

170. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 170 and, on that basis, denies those allegations.

171. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 171 and, on that basis, denies those allegations.

172. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 172 and, on that basis, denies those allegations.

173. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 173 and, on that basis, denies those allegations.

174. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 174 and, on that basis, denies those allegations.

175. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 175 and, on that basis, denies those allegations.

176. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 176 and, on that basis, denies those allegations.

177. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 177 and, on that basis, denies those allegations.

178. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 178 and, on that basis, denies those allegations.

179. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 179 and, on that basis, denies those allegations.

180. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 180 and, on that basis, denies those allegations.

181. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 181 and, on that basis, denies those allegations.

182. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 182 and, on that basis, denies those allegations.

183. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 183 and, on that basis, denies those allegations.

184. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 184 and, on that basis, denies those allegations.

185. Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 185 and, on that basis, denies those allegations.

186. Sun admits that Plaintiffs purport to quote from an earnings call held by Sun Pharmaceutical Industries Ltd. on November 14, 2013, but denies that Plaintiffs accurately and/or completely quote from that call. Sun further states that the earnings call transcript speaks for itself. Sun denies the remaining allegations in Paragraph 186.

187. Sun admits that Plaintiffs purport to quote from an earnings call held by Sun Pharmaceutical Industries Ltd. on November 14, 2013, but denies that Plaintiffs accurately and/or completely quote from that call. Sun further states that the earnings call transcript speaks for itself. Sun Pharmaceutical Industries, Inc. denies the remaining allegations in Paragraph 187.

188. Sun admits that Plaintiffs purport to quote from an earnings call held by Sun Pharmaceutical Industries Ltd. on February 13, 2014, but denies that Plaintiffs accurately and/or completely quote from that call. Sun further states that the earnings call transcript speaks for itself. Sun Pharmaceutical Industries, Inc. denies the remaining allegations in Paragraph 188.

189. Sun states that the referenced source speaks for itself. Sun Pharmaceutical Industries, Inc. denies the allegations in Paragraph 189 and footnote 57.

190. Sun Pharmaceutical Industries, Inc. denies the allegations in Paragraph 190.

191. Sun Pharmaceutical Industries, Inc. denies the allegations in Paragraph 191.

192. Sun denies the allegations in Paragraph 192.

193. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 193 and footnote 58 and, on that basis, denies those allegations.

194. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 194 and footnote 59 and, on that basis, denies those allegations.

195. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 195 and, on that basis, denies those allegations.

196. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 196 and footnote 60 and, on that basis, denies those allegations.

197. Sun states that the referenced source speaks for itself. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 197 and, on that basis, denies those allegations.

198. Sun states that the referenced source speaks for itself. The allegations in Paragraph 198 and footnote 61 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations of Paragraph 198 and footnote 61 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without

sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 198 and footnote 61, and denies those allegations. Sun further denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

199. Sun states that the referenced source speaks for itself. The allegations in Paragraph 199 and footnote 62 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations of Paragraph 199 and footnote 62 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 199 and footnote 62, and denies those allegations. Sun further denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

200. Sun states that the referenced source speaks for itself. The allegations in Paragraph 200 and footnote 63 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations of Paragraph 200 and footnote 63 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical

products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 200 and footnote 63, and denies those allegations. Sun further denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

201. Sun states that the referenced source speaks for itself. The allegations in Paragraph 201 and footnote 64 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations of Paragraph 201 and footnote 64 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 201 and footnote 64, and denies those allegations. Sun further denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

202. Sun admits that B. Douglas Hoey sent a letter to members of Congress dated January 8, 2014, and states that the letter speaks for itself. The allegations in Paragraph 202 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations of Paragraph 202 provide a complete and/or accurate description of the aspects

of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 202, and denies those allegations.

203. Sun admits that on October 2, 2014, Representative Elijah E. Cummings and Senator Bernie Sanders sent a letter to Dilip Shanghvi, and states that the letter speaks for itself. The allegations in Paragraph 203 and footnote 65 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations of Paragraph 203 and footnote 65 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 203 and footnote 65, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

204. Sun states that the referenced source speaks for itself. The allegations in Paragraph 204 and footnote 66 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations of Paragraph 204 and footnote 66 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 204 and footnote 66, and denies those allegations. Sun further states that it is without sufficient

knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

205. Sun states that the referenced source speaks for itself. The allegations in Paragraph 205 and footnote 67 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations of Paragraph 205 and footnote 67 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 205 and footnote 67, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

206. Sun states that the referenced source speaks for itself. The allegations in Paragraph 206 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations of Paragraph 206 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 206, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

207. Sun states that the referenced source speaks for itself. The allegations in Paragraph 207 state legal conclusions to which no response is required. To the extent a response is required,

Sun states that it is without sufficient knowledge or information to admit or deny the allegations in Paragraph 207, and denies those allegations.

208. Sun states that the referenced sources speak for themselves. The allegations in Paragraph 208 and footnotes 68 and 69 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations of Paragraph 208 and footnotes 68 and 69 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 208 and footnotes 68 and 69, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

209. Sun states that the referenced source speaks for itself. The allegations in Paragraph 209 and footnote 70 state legal conclusions to which no response is required. To the extent a response is required, Sun denies that the allegations of Paragraph 209 and footnote 70 provide a complete and/or accurate description of the aspects of the generic drug industry purportedly described, and states that issues pertaining to sales, pricing, and the market for pharmaceutical products must be considered on a case-by-case basis. On that basis, Sun states that it is without sufficient knowledge or information to form a belief about the truth of the allegations in Paragraph 209 and footnote 70, and denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

210. The allegations in Paragraph 210 state legal conclusions to which no response is required. To the extent a response is required, Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 210 and, on that basis, denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

211. Sun states that the referenced sources speak for themselves. Sun admits that on January 9, 2017, a plea hearing was held in a case captioned *United States v. Glazer*, No. 2:16-cr-00506, and states that the transcript of that hearing speaks for itself. Sun further admits that on January 9, 2017, a plea hearing was held in a case captioned *United States v. Malek*, No. 2:16-cr-00508, and states that the transcript of that hearing speaks for itself. The allegations in Paragraph 211 and footnotes 71 and 72 state legal conclusions to which no response is required. To the extent a response is required, Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 211 and footnotes 71 and 72 and, on that basis, denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

212. Sun states that the referenced source speaks for itself. The allegations in Paragraph 212 and footnote 73 state legal conclusions to which no response is required. To the extent a response is required, Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 212 and footnote 73 and, on that basis, denies those allegations.

213. Sun states that the referenced source speaks for itself. The allegations in Paragraph 213 and footnote 74 state legal conclusions to which no response is required. To the extent a response is required, Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 213 and footnote 74 and, on that basis, denies those allegations.

214. Sun states that the referenced sources speaks for themselves. The allegations in Paragraph 214 and footnotes 75 and 76 state legal conclusions to which no response is required. To the extent a response is required, Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 214 and footnotes 75 and 76 and, on that basis, denies those allegations.

215. Sun states that the referenced source speaks for itself. The allegations in Paragraph 215 and footnotes 77 and 78 state legal conclusions to which no response is required. To the extent a response is required, Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 215 and footnotes 77 and 78 and, on that basis, denies those allegations.

216. Sun states that the referenced source speaks for itself. The allegations in Paragraph 216 and footnotes 79 and 80 state legal conclusions to which no response is required. To the extent a response is required, Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 216 and footnotes 79 and 80 and, on that basis, denies those allegations.

217. Sun admits that in May 2016, it received a grand jury subpoena from the Antitrust Division of the DOJ. Sun states that the referenced sources speak for themselves. The allegations in Paragraph 217 and footnotes 81 and 82 state legal conclusions to which no response is required.

To the extent the allegations relate to Sun, Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 217 and footnotes 81 and 82 and, on that basis, denies those allegations.

218. The allegations in Paragraph 218 state legal conclusions to which no response is required. To the extent the allegations relate to Sun, Sun states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations in Paragraph 218 and, on that basis, denies those allegations.

219. Sun states that the referenced source speaks for itself. The allegations in Paragraph 219 and footnotes 83, 84, 85, and 86 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations.

220. The allegations in Paragraph 220 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations.

221. Sun states that the referenced source speaks for itself. The allegations in Paragraph 221 and footnote 87 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations.

222. Sun admits that the Department of Justice filed Complaints in the U.S. District Court for the Eastern District of Pennsylvania and states that those Complaints speak for themselves. Sun also admits that on January 9, 2017, a plea hearing was held in a case captioned *United States v. Glazer*, No. 2:16-cr-00506, and states that the transcript of that hearing speaks for itself. Sun further admits that on January 9, 2017, a plea hearing was held in a case captioned *United States v. Malek*, No. 2:16-cr-00508, and states that the transcript of that hearing speaks for itself. The remaining allegations in Paragraph 222 state legal conclusions to which no response is required. To the extent a response is required, Sun states that it is without sufficient knowledge or

information to admit or deny the remaining allegations in Paragraph 222, and, on that basis, denies those allegations.

223. Sun states that the referenced sources speak for themselves. The allegations in Paragraph 223 and footnotes 88, 89, and 90 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 223 and footnotes 88, 89, and 90 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that the allegations contained in Paragraph 223 and footnotes 88, 89, and 90 relate to issues that have been raised, but not proven, in the cited litigation, and, on that basis, denies those allegations. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

224. Sun states that the referenced source speaks for itself. The allegations in Paragraph 224 and footnote 91 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 224 and footnote 91 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

225. Sun states that the referenced sources speak for themselves. Sun admits that the attorneys general of certain states filed a complaint in the U.S. District Court for the District of Connecticut against certain generic pharmaceutical drug manufacturers, and states that the Complaint in Paragraph 225 and footnotes 92 and 93 speaks for itself. Sun further states that the

allegations in Paragraph 225 and footnotes 92 and 93 relate to issues that have been raised, but not proven, in the cited litigation, and, on that basis, denies those allegations. The remaining allegations in Paragraph 225 and footnotes 92 and 93, state a legal conclusion to which no response is required. To the extent a response is required, Sun denies the remaining allegations in Paragraph 225 and footnotes 92 and 93. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

226. Sun states that the referenced source speaks for itself. Sun further states that the allegations in Paragraph 226 and footnote 94 relate to issues that have been raised, but not proven, in the cited litigation, and, on that basis, denies those allegations. The remaining allegations in Paragraph 226 and footnote 94, state a legal conclusion to which no response is required. To the extent a response is required, Sun denies the remaining allegations in Paragraph 226 and footnote 94. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

227. Sun states that the referenced sources speak for themselves. Sun further states that the allegations in Paragraph 227 and footnote 95 relate to issues that have been raised, but not proven, in the cited litigation, and, on that basis, denies those allegations. The remaining allegations in Paragraph 227 and footnote 95 state a legal conclusion to which no response is required. To the extent a response is required, Sun denies the remaining allegations in Paragraph 227 and footnote 95. Sun further states that it is without sufficient knowledge or information to form a belief about the truth of the allegations that relate to entities other than Sun and, on that basis, denies those allegations.

228. Sun states that the referenced source speaks for itself. The allegations in Paragraph 228 and footnote 96 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 228 and footnote 96 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

229. Sun states the referenced source speaks for itself. The allegations in Paragraph 229 and footnote 97 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 229 and footnote 97 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

230. Sun states that the allegations in Paragraph 230 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 230 that relate to Sun, denies that it has engaged in any wrongdoing alleged in the Complaint, and denies that Plaintiffs have been injured as a result of any conduct by Sun. Sun further states that it is without sufficient knowledge or information to form a belief as to the truth of the allegations that relate to any entities other than Sun and, on that basis, denies those allegations.

VI. THE DOXYCYCLINE MARKET

231. The allegations in Paragraph 231 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 231.

232. The allegations in Paragraph 232 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 232.

233. The allegations in Paragraph 233 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 233.

VII. CLASS ACTION ALLEGATIONS

234. The allegations in Paragraph 234 state legal conclusions to which no response is required. To the extent a response is required, Sun admits that Plaintiffs purport to bring an action on behalf of the class described in Paragraph 234. Sun denies that any such class has been properly asserted or may be certified under Federal Rule of Civil Procedure 23. Sun denies the remaining allegations in Paragraph 234.

235. The allegations in Paragraph 235 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations.

236. The allegations in Paragraph 236 state legal conclusions to which no response is required. To the extent a response is required, Sun admits that Plaintiffs purport to bring an action on behalf of the class described in Paragraph 236. Sun denies that any such class has been properly asserted or may be certified under Federal Rule of Civil Procedure 23. Sun denies the remaining allegations in Paragraph 236.

237. The allegations in Paragraph 237 state a legal conclusion to which no response is required. To the extent a response is required, Sun lacks sufficient knowledge or information to admit or deny the allegations, and, on that basis, denies the allegations in Paragraph 237.

238. The allegations in Paragraph 238 state a legal conclusion to which no response is required. To the extent a response is required, Sun lacks sufficient knowledge or information to admit or deny the allegations, and, on that basis, denies the allegations in Paragraph 238.

239. The allegations in Paragraph 239 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the remaining allegations in Paragraph 239.

240. The allegations in Paragraph 240 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 240.

241. The allegations in Paragraph 241 state legal conclusions to which no response is required. To the extent a response is required, Sun admits that Plaintiffs purport to bring an action on behalf of the class described in Paragraph 241. Sun denies that any such class has been properly asserted or may be certified under Federal Rule of Civil Procedure 23. Sun denies the remaining allegations in Paragraph 241.

242. The allegations in Paragraph 242 state legal conclusions to which no response is required. To the extent a response is required, Sun admits that Plaintiffs purport to bring an action on behalf of the class described in Paragraph 242. Sun denies that any such class has been properly asserted or may be certified under Federal Rule of Civil Procedure 23. Sun denies the remaining allegations in Paragraph 242.

VIII. ANTITRUST INJURY

243. The allegations in Paragraph 243 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 243.

244. The allegations in Paragraph 244 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 244.

245. The allegations in Paragraph 245 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 245.

246. The allegations in Paragraph 246 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 246.

IX. CLAIM FOR RELIEF – VIOLATION OF SECTION 1 OF THE SHERMAN ACT

247. Sun incorporates by reference its response to all of the allegations above.

248. The allegations in Paragraph 248 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 248.

249. The allegations in Paragraph 249 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 249.

250. The allegations in Paragraph 250 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 250.

251. The allegations in Paragraph 251 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 251.

252. The allegations in Paragraph 252 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 252.

253. The allegations in Paragraph 253 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 253.

254. The allegations in Paragraph 254 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 254.

255. The allegations in Paragraph 255 state legal conclusions to which no response is required. To the extent a response is required, Sun denies the allegations in Paragraph 255.

X. RESPONSE TO PLAINTIFFS' PRAYER FOR RELIEF

The Prayer for Relief states legal conclusions to which no response is required. To the extent a response is required, Sun denies that Plaintiffs are entitled to any of the relief sought in the Complaint.

XI. JURY TRIAL DEMAND

No response is required to Plaintiffs' jury demand. To the extent a response is required, Sun denies that Plaintiffs are entitled to any of the relief they seek.

Sun denies any and all remaining allegations in the Complaint that are not expressly and specifically admitted above.

AFFIRMATIVE DEFENSES

Without assuming any burdens that it would not otherwise bear, Sun asserts the following affirmative defenses. Sun reserves the right to amend or supplement its Affirmative Defenses:

FIRST AFFIRMATIVE DEFENSE

Plaintiffs are barred from recovery for some or all of the claims asserted against Sun because Plaintiffs failed to state a claim upon which relief can be granted.

SECOND AFFIRMATIVE DEFENSE

Plaintiffs are barred from recovery for some or all of the claims asserted against Sun because Plaintiffs lacks standing to assert their claims.

THIRD AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred, in whole or in part, by the applicable statutes of limitations.

FOURTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred, in whole or in part, because Plaintiffs have not suffered injury proximately caused by any conduct of Sun and/or have not suffered, and will not suffer, injury of the type that the relevant statutes were designed to prevent.

FIFTH AFFIRMATIVE DEFENSE

The damages alleged in Plaintiffs' Complaint, if any, were caused, in whole or in part, by Plaintiffs' own conduct, by the conduct of persons or entities with regard to whom Plaintiffs are

legally responsible, and/or by the conduct of persons or entities with regard to whom Sun is not legally responsible, and not by any alleged conduct on the part of Sun.

SIXTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred, in whole or in part, because Plaintiffs' alleged damages, if any, are too speculative and uncertain.

SEVENTH AFFIRMATIVE DEFENSE

Plaintiffs' claim for damages is barred in whole or in part by Plaintiffs' failure to exercise due care to avoid, mitigate or protect against any damages allegedly sustained.

EIGHTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred, in whole or in part, by the doctrines of waiver, estoppel, unclean hands, and/or laches.

NINTH AFFIRMATIVE DEFENSE

To the extent Plaintiffs' claims would result in Sun paying damages to more than one claimant for the same alleged overcharge, they are barred because such multiple liability would violate rights guaranteed to Sun by the United States Constitution, including, without limitation, rights guaranteed under the Due Process Clause of the Fourteenth Amendment.

TENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred, in whole or in part, because the acts or omissions of Sun did not substantially lessen competition in any properly defined market.

ELEVENTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred, in whole or in part, because Sun's actions were in the furtherance of legitimate business interests of Sun and were not part of any contract, combination, or conspiracy in restraint of trade.

TWELFTH AFFIRMATIVE DEFENSE

Without admitting the existence of any contract, combination or conspiracy in restraint of trade, and expressly denying same, Plaintiffs' claims are barred, in whole or in part, by non-settling Defendants' right to set off any amounts paid to Plaintiffs by any Defendants who have settled, or do settle, Plaintiffs' claims against them in this action.

THIRTEENTH AFFIRMATIVE DEFENSE

This action cannot be certified as a class action under the provisions of Rule 23 of the Federal Rules of Civil Procedure.

FOURTEENTH AFFIRMATIVE DEFENSE

Sun also reserves all affirmative defenses under Federal Rule of Civil Procedure 8(c) and any other defenses, at law or in equity, that may now exist or in the future be available based on discovery and further factual investigation in this case.

Sun adopts by reference any additional, applicable defense pleaded by the other Defendants in this matter.

Sun, further, denies each and every allegation of Plaintiffs' Complaint except as expressly admitted or qualified above. Sun prays that the Complaint be dismissed with prejudice, that the Court find Plaintiffs are not entitled to any judgment or relief, that the Court enter judgment in favor of Sun and against Plaintiffs, and that the Court award Sun such other relief as the Court deems just and proper.

Dated: January 31, 2019

Respectfully submitted,

/s/ J. Douglas Baldrige

J. Douglas Baldrige
Lisa Jose Fales
Danielle R. Foley
VENABLE LLP
600 Massachusetts Avenue, NW
Washington, D.C. 20001
(202) 344-4000
jbaldrige@venable.com
ljfales@venable.com
drfoley@venable.com

Thomas J. Welling, Jr.
Benjamin P. Argyle
VENABLE LLP
1270 Avenue of the Americas
24th Floor
New York, New York 10020
(212) 307-5500
tjwelling@venable.com
bpargyle@venable.com

*Counsel for Defendant Sun Pharmaceutical
Industries, Inc.*

CERTIFICATE OF SERVICE

I hereby certify that on January 31, 2019, a copy of the foregoing Answer was served on counsel for all parties through this Court's CM/ECF System.

Dated: January 31, 2019

/s/ J. Douglas Baldrige
J. Douglas Baldrige